LIST OF EXHIBITS AND WITNESSES

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Case Numl	oer	2:11-cv-0148				bert Contreras v. City of I		
Judge		Stephen V. V	viison, U.S.	District Ju	uge		FILED CHERK U.S. DISTRICT COURT	·
Dates of Trial or Hearing 09/19-09/21					SEP 2 + 2012			
Court Rep or Tape N	Court Reporters or Tape No. Deborah Gackle						CENTRAL DISTRICT OF CALIFORNIA DEPUTY	
Deputy Clo	erks	Paul M. Cruz	Z				DEPUTY DEPUTY	<u>-</u>
	Att	orney(s) for Pla	aintiff(s) / Pe	titioner(s)		Attorn	ney(s) for Defendant(s) / Respondent(s)	1
Dale K. G.	alipo					Craig Miller		
William L	. Schmi	dt				Geoffrey Plowden		
		\$						
					- "			
Plaintif	f(s) or P	etitioner(s)		efendant(s) espondent(ЕХНІВІТ ДЕ	SCRIPTION / WITNESS	Called By
Ex. No.	Id.	Ev.	Ex. No.	Id.	Ev			
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Case 2:11	cv-01480-SVW-SH Document 204	Filed 09/21/12	Page 2 of 10 Page	age ID #:2394		
•		·	·			
. 1	LAW OFFICES OF DALE K. GAI	JPO				
2	dalekgalipo@yahoo.com	0				
3	Dale K. Galipo, Esq. (Bar No. 1440 dalekgalipo@yahoo.com 21800 Burbank Boulevard, Suite 31 Woodland Hills, California 91367 Telephone: (818) 347-3333 Facsimile: (818) 347-4118					
. 4	Facsimile: (818) 347-4118	•				
5	William L. Schmidt. Esq. (Bar No.	206870)				
6						
7	Fresho, Camornia 93711 Telephone: (559) 261-2222					
8	Facsimile: (559) 436-8163	e en	•			
9	Attorneys for Plaintiff					
10	UNITED STA	ATES DISTRICT	COURT			
11	CENTRAL DI	STRICT OF CALI	FORNIA			
12	ROBERT CONTRERAS,	Case No. C	V11-01480 SVV	V (SH)		
13	Plaintiff,	The Honor	able Stephen V. V	Wilson		
14	vs.	JOINT EX	HIBIT LIST			
15	CITY OF LOS ANGELES; JULIO	Trial Date:	September 18,	2012		
16	BENAVIDES; MARIO FLORES; a DOES 1-10, inclusive,	na				
17	Defendants.					
18						
19	TO THIS HONORABLE COURT	·				
20	Pursuant to the Local Rules of		District Court C	entral		
21	•		•	VIIII (II		
22	District, Rule 9.7, the parties submit a Joint Exhibit List as follows: EXHIBITS					
23	No. Descript		Date	Date		
24			Identified	Admitted		
25		TIFF'S EXHIBIT				
26	1 [ID ONLY] Consultation R		nia			

No.	Description	Date Identified	Date Admitted
	PLAINTIFF'S EXHIBITS		
1	[ID ONLY] Consultation Record from California		
	Hospital Medical Center dated 9/04/05 by		
	Samuel Biggers, M.D.		

JOINT EXHIBIT LIST

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1		EXHIBITS					i n	
2	No.	Description			ate tified	THE STREET	Dat dmi	
3	2	Diagram dated of injuries dated 09/03	SE	P 1	9 2012	1	e fort e Sage	<u> </u>
4	3	[ID ONLY] California Hospital Medical Center						
5		Emergency Department Physician Record						
6	4	[ID ONLY] Plaintiff's medical records from						
7		California Hospital Medical Center						
8	5	[ID ONLY] Discharge Summary and						
9		Accompanying Documents from California				ŀ		,
0		Hospital Medical Center						
1	6	[ID ONLY] Plaintiff's medical records from						
2		Rancho Los Amigos						
3	7 [ID ONLY] Rule 26 Report of H. Ronald Fisk,							
4		M.D. – Original and Supplemental/Addendum	-					
5	8	[ID ONLY] Rule 26 Report of Marianne Inouy	1	9 2	012]			
6		- Original and Supplemental/Addendum		J 2	ure;			
7	9	[ID ONLY] Rule 26 Report of Elizabeth	P	19	2012	SEP	19	2012
8		Holakiewicz – Original and 1954 – 24						
9		Supplemental/Addendum						
)	10	Demonstrative Evidence For Plaintiff's Experts:						
		Medical Equipment, Anatomical Models and	EP	19	2012	SEP	19	2012
2 		Photographs of Medical Equipment						
3 .	11	Family Photographs; Photographs of Plaintiff	F= 15			een	0.6	- 20
 -		before shooting		20	2012	SEP		
5 - -	12	Photographs of Plaintiff's scars 4(5) 1211)	EP	20	2012	SEP	20	201
5	13	RPM Nighthawk Preliminary Report dated						
7 , L		9/3/2005						
3		-2-						
		JOINT EXHIBIT LIST						

1	13 (13) Tags	EXHIBITS	(6.//D) (2.//D)					
2	No.	Description	l		ate tified	A	Da dmi	te tted
3	14	X-Rays of Plaintiff's injuries 1,2,3 SE			2012/			2012
ֈ	15	[ID ONLY] Rule 26 Report of Dr. Suzy Kim –			_			
;		Original and Supplemental/Addendum 6/6	EP	2 (SI 2012 (7 2 (20	12]
	16	[ID ONLY] Rule 26 Report of Barbara						
		Greenfield – Original and	P	2 n	20121	SEP	2 (2012
		Supplemental/Addendum 69			L. ((6 ₀		٠ ,	בטוב
	17	[ID ONLY] Rule 26 Report of Jenny McNulty –						
		Original and Supplemental/Addendum	EP	19	2012			
	18	Charts from Elizabeth Holakiewicz reports SEP	19	201	2]	SEP	19	20121
	19	Charts from Marianne Inouye reports						-vej
	20	Charts from H. Ronald Fisk, M.D. reports			•			
	21	Charts from Jennie McNulty reports						
		EXHIBITS 22-200 RESERVED FOR						
		PLAINTIFF						
		DEFENDANTS' EXHIBITS						
	314	Medical Records Calif. Dept of Corrections						
		(same as in first phase)						
	315	Medical records from Rancho Los Amigos (same				-		-
		as in first phase, records received as of 11/30/11)			·			
	400	Report and addendum from Dr. Suzy Kim						
	401	Report and addendum from Barbara Greenfield	10 100					
-	402	Report and addendum from Jennie McNulty		20	2012	SEP	20	2012
-	403	Booking photo of Plaintiff dated 11/22/2002						
	404	Report of Kris Mohandie	,					
	**							·=

JOINT EXHIBIT LIST

1	EXHIBITS						
2	III NTO	Description	Date Identified	- Date Admitted			
. 3	405	Police Report Montebello PD date April 5, 1999					
4	406	Medical Records received from Rancho Los					
5		Amigos (Received July and August 2012)					
6	407	Omitted					
7	408	Transcript and CD of Plaintiff's recorded					
8		statement dated					
9	409	SCI information provided by Dr. Fisk					
10	410	Booking photo of Plaintiff date 2/23/2001					
11	411	Toxicology results from California Hospital					
12	Medical Center						
13	412	12 Rap Sheet of Plaintiff					
14 15		laintiff hereby reserves the right to amend, add to, or steed information should it become necessary and/or	•				
16 17	DATEC	2: September 12, 2012 LAW OFFICES OF DA	LE K. GALI	PO			
18		By /s/ Dale	V Colina				
19		Dale K. Galipo Attorneys for Plainti	K. Galipo				
20	///	Auomeys for Flamin	11				
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		JOINT EXHIBIT LIST					

1 2 3 4	Dale K. 6 dalekgal 21800 B Woodlar Telephor	FFICES OF DALE K. GALIPO Galipo, Esq. (Bar No. 144074) ipo@yahoo.com urbank Boulevard, Suite 310 nd Hills, California 91367 ne: (818) 347-3333 e: (818) 347-4118					
5 6 7 8	William L. Schmidt. Esq. (Bar No. 206870) bschmidt@ncinternet.net						
9	Attorney	s for Plaintiff					
10		UNITED STATES	DISTRICT COURT				
11		CENTRAL DISTRIC	CT OF CALIFORNIA				
12	ROBERT	Γ CONTRERAS,	Case No. CV11-01480 SVW (SH)				
13		Plaintiff,	The Honorable Stephen V. Wilson				
14	vs.		PLAINTIFF'S WITNESS LIST				
15 16	CITY OF BENAVI DOES 1-	LOS ANGELES; JULIO DES; MARIO FLORES; and 10, inclusive,	Trial Date: September 18, 2012				
17		Defendants.					
18							
19							
20	i F		iff respectfully submits the following list				
21	of witness	ses who may be called at trial:					
22	Wit	Witnesses:					
23	1.	Robert Contreras * SEP 202	2012				
24	2.	Irma Payan*					
25	3.	Marisol Torres*					
26	4.	Myra Contreras*SEP 2 0 2012					
27	5.	T.V. (minor)*					
28	6.	I.R. (minor)*					
1			PLAINTIFF'S PROPOSED WITNESS LIST				

Cas	se 2:1:	1 cv-01480-9	SVW-SH Document 204 Filed 09/21/12 Page 7 of 10 Page ID #:2399
	1	7.	Marianne Inouye (retained expert – economist) SEP 19 2012, SEP 20 20
	2	8.	Elizabeth Holakiewicz (retained expert – life care planner) are
	3	9.	H. Ronald Fisk, M.D. (retained expert –physician) SEP 19 2012
	4	10.	Jin K. Park, M.D.*
	5	11.	Samuel Biggers, M.D.*
	6	12.	David Allan Duarte, M.D.*
	7	13.	Charles Klieman, M.D.*
	8	14.	Min-Ning Huang, M.D.*
	9	15.	Ramzi Ben Youssef, M.D.*
	10	16.	Barbara Greenfield* SEP 2 0 2012
	11		
	12	DATED: 9	D/13/2012 LAW OFFICES OF DALE K. GALIPO
	13		
	14		By/s/ Dale K. Galipo
	15		DALE K. GALIPO Attorneys for Plaintiff
	16		Tittorneys for Traintiff
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	-		PLAINTIFF'S PROPOSED WITNESS LIST

1	CARMEN A. TRUTANICH, City Attorney (SBN 86629x) GARY G. GEUSS, Chief Assistant City Attorney CORY M. BRENTE, Assistant City Attorney CRAIG J. MILLER, Deputy City Attorney (SBN 138302) 200 North Main Street City Hall East, 6th Floor Los Angelos, CA 20012						
2	CORY M. BRENTE, Assistant City Attorney CRAIC I MILLER Deputy City Attorney (SPN 138302)						
3	200 North Main Street						
4	I LOS Aligeles, CA 90012						
5	Telephone No.: (213) 978-8722 Facsimile No.: (213) 978-8785						
6	Email: craig.miller@lacity.org						
7	Attorneys for Defendants JULIO BENAV	·					
8		S DISTRICT COURT					
9	CENTRAL DISTR	ICT OF CALIFORNIA					
10							
11	ROBERT CONTRERAS,	Case No. CV11-01480 SVW (SHx) Hon. Stephen V. Wilson; Crtm 6					
12	Plaintiff,	DEFENDANTS' PRELIMINARY					
13	vs.	PROPOSED LIST OF WITNESSES FOR PHASE 2 OF TRIAL					
14	CITY OF LOS ANGELES; JULIO BENAVIDES; MARIO FLORES; and DOES 1 - 10, Inclusive,	DDE TRIAL CONTERRICE					
15	DOES 1 - 10, Inclusive,) PRE-TRIAL CONFERENCE AUGUST 27, 2012					
16	Defendants.	TRIAL: SEPTEMBER 18, 2012					
17		}					
18							
19							
20	TO THIS HONORABLE COURT AND P	LAINTIFF AND HIS ATTORNEYS OF					
21	RECORD:						
22	COME NOW Defendants, MARIO FLORES AND JULIO BENAVIDES with their						
23	list of witnesses for trial for Phase 2 of trial. Defendants reserve their rights to call other						
24	witnesses for the purposes of impeachment or rebuttal.						
25	Defendants may need to revise this	witness list based upon the court's rulings					
26	concerning motions in limine.						
27	///						
28	///						

WITNESSES: 1 2 LAPD Detective Julio Benavides –involved officer in seizure of Robert Contreras LAPD Officer Mario Flores—involved officer in seizure of Robert Contreras 3 Robert Contreras – Plaintiff 4 Edward De La Cruz - crime partner of Contreras, involved in crime of drive by 5 shooting, was in car with Contreras on Sept. 3, 2005. Address, believed to be in 6 California State Prison. Percipient witness to Plaintiff's life prior to September 3, 2005. 7 Det Kerry Young, 30612 – took statement of Contreras 8 Det. Brien Pogue, 30523 – took statement of Contreras 9 Experts: 10 Kris Mohandie, Ph.D. – psychologist 11 Dr. Suzy Kim – Specialist in Spinal Cord Injury 9-20 12 Barbara Greenfield - RN life care planning 13 Jennie McNulty - Economist SEP 2 0 2012 14 Any medical professionals from Rancho Los Amigos as needed to explain 15 Plaintiff's condition or history, likely only arises for impeachment. 16 Persons from Rancho Records 17 18 19 April Burrell 20 Maricela Zambrana 21 Vinod Dhawan MD Charlotte Sykora, Phd. 22 23 Min-Ning Huang MD or Jacqueline Xavier PA-C 24 Irene Gilgoff and Melanie Sarno 25 Olivia Hernandez 26 Valerie Burrells 27 Robert Dela Cruz 28 Ruth Hearvey

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1	Joesph Escudero	
2	Baudelia Martinez	
3	Elvia Pena	
4		
5	DATED: September 7, 2012	Respectfully submitted,
6		
7		CARMEN A. TRUTANICH, City Attorney GARY GEUSS, Chief Assistant City Attorney CORY M. BRENTE, Assistant City Attorney
8		CORY M. BRENTE, Assistant City Attorney
9		
10		By /S/ CPAIG I MILLER Deputy City Attorney
11		By/S/ CRAIG J. MILLER, Deputy City Attorney Attorneys for Defendants JULIO BENAVIDES AND MARIO FLORES
12	·	MARIO FLORES
13		
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